September 28, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

> Re: *Ex Parte* Presentation, Lifeline and Link Up Reform and Modernization,
>   WC Docket Nos. 11-42, 03-109 and CC Docket No. 96-45

Dear Ms. Dortch:

Educational Services Network, Corp. ("EdNet") strongly supports the Commission's proposal, as part of its reforms of the Lifeline and Link Up programs, to provide support for low-income broadband pilot projects.[1] In the *Lifeline/Link Up Notice*, the Commission called specifically for pilot project proposals that would target non-native speakers of English.[2] Answering the Commission's call, EdNet has developed a proposal for a low-income broadband pilot project (the "Pilot Project") to benefit the residents of the municipality of Villalba, Puerto Rico. In this filing, EdNet describes the proposal, and offers additional discussion on the issues raised by the Commission in its recent *Further Inquiry*.[3]

Background and Need for a Pilot Project in Villalba, Puerto Rico

With the overwhelming preponderance of Spanish as the language of daily life in Puerto Rico, there is no better place in the nation to launch such a pilot. Within Puerto Rico, Villalba is a small municipality of approximately 37 square miles in the remote central region of Puerto Rico, with a total 2010 population of approximately 26,000 people,[4] spread among a small central town and several surrounding *barrios*. Unemployment in Puerto Rico is rising, and is currently the highest in the nation at a seasonally adjusted 16 percent (August 2011).[5] In Villalba, in the Fourth Quarter of

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[1] *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Notice of Proposed Rulemaking, FCC 11-32, 26 FCC Rcd 2770 (2011) (*Lifeline/Link Up Notice*), at ¶ 279.

[2] *Id.* at ¶ 280.

[3] Public Notice, *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, DA 11-1346 (rel. Aug. 5, 2011).

[4] Source: U.S. Census data.

2010, roughly 3,500 people were employed, and wages averaged $526 per week, just over half the national average of $917, and below the Puerto Rico average of $559.[6]

The situation in Villalba reflects the challenges faced by municipalities across Puerto Rico, where broadband adoption lags that of other areas of the nation by a considerable margin. Recent research show that only 31 percent of households subscribe to broadband services.[7] Although broadband is available in Villalba, cost and digital literacy represent substantial barriers to adoption. The 2010 Residential Technology Assessment conducted by Connect Puerto Rico found that, among those without Internet access at home, 17 percent said that Internet service is too expensive, and another 38 percent said that the reason was that they did not own a computer.[8] Among those without a computer, another 27 percent said that computers were too expensive.[9] Claro (formerly Puerto Rico Telephone Company) advertises broadband availability only when bundled with voice telephone service, with prices for 1Mbps service starting at $46.99/month, plus taxes and fees.[10] This figure is consistent with the Residential Technology Assessment, which found that the average price of broadband was $42.37/month, more than the national average and unaffordable to most Villalba residents.[11]

Digital literacy is at least as significant a barrier as cost. According to the 2010 Residential Technology Assessment, among those with no Internet connection at home, 36 percent said that they did not need the Internet, or did not know why they did not subscriber.[12] Among those without a computer, 54 percent said that they did not need a computer, or did not know why they needed one.[13] Improved adoption rates are vital to improve the quality of life of the residents of Puerto Rico. As the Internet becomes an increasingly essential tool to participate in modern American life and culture, this lack of access only compounds the physical isolation that Puerto Ricans experience as residents of an insular area.

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[5] U.S. Department of Labor, Bureau of Labor Statistics, *Regional and State Employment and Unemployment – August 2011* (Sept. 16, 2011), available at: http://www.bls.gov/news.release/laus.htm.

[6] U.S. Department of Labor, Bureau of Labor Statistics, *County Employment and Wages in Puerto Rico – Fourth Quarter 2010* (July 28, 2011), available at: http://www.bls.gov/ro2/prqcew.htm.

[7] *See* Connect Puerto Rico, Residential Technology Assessment Results (2010), at 12 (available at: http://en.connectpr.org/_documents/PR_RTA_2010Q1_FINAL.pdf).

[8] *Id.* at 59.

[9] *Id.* at 58.

[10] *See* http://www.telefonicapr.com/Default.aspx?SecId=300.

[11] Residential Technology Assessment Results, at 35.

[12] *Id.* at 59.

[13] *Id.* at 58.

As is reflected in its previous filings in the above-referenced dockets, EdNet has substantial experience in using innovative ways to deliver broadband services to low-income individuals, chiefly in rural areas of Puerto Rico. Since 2000, EdNet has provided broadband data services to educational, government and private institutions in Puerto Rico to enhance public access to these services, especially among low-income Puerto Ricans. As of today, EdNet serves over 100 libraries in public and private schools in over 50 Puerto Rican municipalities, including the remote, off-shore municipalities of Vieques and Culebra. EdNet is staffed by experts in the fields of education, management and education technology, and network operations. It provides research, planning and educational programs to promote integration of technology into classroom environments to improve the educational experience and opportunities of Puerto Rican students.

Because of its experience and expertise, EdNet is uniquely positioned to develop and execute a low-income broadband pilot project focusing on the needs of non-native speakers of English, one of the key target groups that the Commission has identified in its Notice of Proposed Rulemaking.[14] The vast majority of Puerto Ricans report that they do not speak English well. EdNet has a first-hand understanding of the impact of this language barrier between Puerto Rico and the rest of the continental United States, limiting access to economic and cultural opportunities available to those in other parts of the nation. Partly as a result, the U.S. Census Bureau estimates that 44.9 percent of the population of Puerto Rico falls below the federal poverty line, with rates in the interior of the island reaching upward of 60 percent.[15]

The Villalba Pilot Project

EdNet's Pilot Project proposal for Villalba is based on a public-private partnership with the municipality. It would provide access to broadband services, equipment, and training across the municipality, with very low cost broadband options available to qualifying low-income residents of Villalba. It would do so in a comprehensive manner designed to foster sustainable broadband adoption, and includes broadband service, customer premises equipment necessary to connect to the service, and digital literacy training using EdNet's broadband curriculum.

In addition to other well-recognized benefits of broadband, Villalba residents would be able to use broadband services to learn English through online and distance learning options, obtain information in their native language, Spanish, and use automated translation services included in many web browsers. While the pilot project would initially focus on the town of Villalba and adjacent housing developments, with success, EdNet would intend to expand it to include the entire municipality.

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[14] *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Notice of Proposed Rulemaking, FCC 11-32, 26 FCC Rcd 2770 (2011), at ¶ 280.

[15] U.S. Census Bureau, American Community Survey (data summarized at: http://www.newyorkfed.org/regional/community_poverty.html).

The Pilot Project would incorporate the following elements:

Broadband Service. The Pilot Project would rely on a wireless mesh network using unlicensed spectrum and WiFi technology. EdNet has previously deployed similar networks to provide broadband access in the Puerto Rican municipalities of Mayagüez, San Lorenzo and Luquillo. These networks are now operational, with those in Mayagüez and San Lorenzo providing wireless broadband Internet access to residents and visitors located in the downtown areas of each municipality. The Luquillo network, scheduled to be operational in November 2011, will be used for public safety and remote surveillance of specific areas of the municipality.

The network would be deployed in partnership with the Municipality of Villalba, which has agreed to contribute a number of elements critical to the deployment of the network, including:

- Space for the installation of servers and wireless equipment nodes;

- Space in towers, poles or buildings for the installation of antennas and associated equipment;

- Space for establishing a project administration office to manage the system;

- Electric power for all the equipment;

- Air conditioning, physical security and surveillance of equipment sites and administration office;

- Assistance to EdNet in obtaining any required permits; and

- Assistance to EdNet during the installation and maintenance process, including vehicular traffic control, installation of poles or towers, obtaining and installing power meters, and the like.

With this assistance, EdNet estimates that the network equipment could be installed and operational in roughly three months after the Pilot Project start date. To provide effective adoption and performance data, EdNet believes that Pilot Project support should continue for three years thereafter.

Eligibility. The Municipality of Villalba has agreed to provide verification of eligibility for those customers meeting the income threshold. EdNet, therefore, recommends that the Commission establish the eligibility criteria for the low-income broadband pilot program that mirror those in effect for the traditional Lifeline program.

According to USAC data, there are nearly 450,000 Lifeline customers in Puerto Rico, so carriers and municipalities are familiar with these requirements.[16]

The level of support that would be required from federal mechanisms would necessarily depend on the income eligibility threshold the Commission establishes, as well as the rates EdNet charges to those customers, discussed below.

Equipment and Maintenance. Some residents of Villalba may be able to obtain adequate WiFi signal strength without the use of any additional Customer Premises Equipment (CPE), but most subscribers will need an external antenna, in addition to a receiver/transmitter and associated transmission line to receive an adequate wireless signal. This equipment will provide a standard wired Ethernet connection to connect to the subscriber's broadband-enabled device. The subscriber would also be able to obtain and install a standard WiFi router to provide wireless signal to portable computing devices.

In addition to the CPE required to establish the broadband connection, some residents of Villalba will need to obtain a broadband-enabled computing device, such as a desktop, laptop, or tablet computer. EdNet would make one or more such devices available to its customers. Depending on the eligibility of such equipment for support under the pilot program rules, EdNet would make broadband-enabled equipment available to its customers supported by low-income broadband pilot funding at a cost below the prices available to other customers, either through low-cost financing options or federal support.

Digital Literacy Training. The Connect Puerto Rico (connectpr.org) broadband deployment analysis published on October, 2010, indicate that over one-third of Puerto Rico residents who do not have home broadband service say it is because they do not need Internet service or gave no reason for not subscribing. More than one fourth do not subscribe because they do not have a computer. This finding makes it clear that a substantial effort is required in providing residents with knowledge and training on computer and broadband related services usage.

EdNet has extensive experience with digital literacy training in Puerto Rico necessary to overcome these barriers to adoption. In addition, the Municipality of Villalba has agreed to provide support, including:

- Assistance in promoting the availability of the system and in obtaining advertisements that will be placed in the system's web page;

- Assistance in identifying residents that need computing equipment and digital literacy training; and

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[16] Universal Service Administrative Company, Federal Universal Service Support Mechanisms Fund Size Projections for Fourth Quarter 2011, Appendix LI08.

- Space for conducting the training programs, such as meeting rooms in municipal libraries.

EdNet would begin with outreach to those that may benefit from such training in the use of a computer or broadband services in three phases, as follows:

First phase - Survey among those applying for services to identify the digital literacy and broadand usage training needs of each member of the household.

Second phase – With the aid of the municipality, identify those residents that have not applied and survey their reasons for not applying. This will identify any residents that have not requested the service because either they do not have a broadband-enabled computing device or because they are not aware that broadband service is available. Once identified, EdNet would be able to inform these residents of the availability and costs of devices and services, as well as the costs, including potential eligibility for reduced-cost equipment and services as participants in the low-income Pilot Project.

Third phase – Make promotional materials available in Villalba libraries where broadband is currently available, to inform residents that broadband access is now available for their homes through the Pilot Project. Library users, including students, would be able to spread the news about the availability of the broadband and training services.

After identifying the training needs EdNet will make use of the existing municipal electronic libraries and other municipal facilities to conduct training for residents using its proven curriculum, including:

1. Seminars to demonstrate the importance of adopting the Internet and how broadband usage can improve their quality of life.

2. Training on basic computer operations including hands on laboratory sessions.

3. Training on basic Internet usage from the user interest perspective including hands on laboratory sessions.

4. Tutoring services to users that need to refine their computer and Internet usage skills.

5. Tutoring to users on how to setup and maintain the customer premises equipment.

6. Any additional activity that may arise from the experience administering the above training activities.

EdNet expects to offer these seminars to groups of ten to twenty residents at a time, and the sessions will be scheduled just after the end of the Pilot Project's equipment testing activity, to coincide with the launch of public access to the Pilot Project's broadband services. Sessions will be scheduled in accord with demand, and to meet the schedules of the interested participants. In addition, EdNet will distribute printed reference material to all participants.

EdNet will also provide one-on-one tutoring services at these libraries, except in those cases where the subscriber is handicapped and cannot travel to the library, in which case, EdNet representatives would travel to the subscriber's home.

All of this training program will be deployed using EdNet's proven training methodology that has been developed by EdNet and perfected over the years. EdNet has the capability to carry out this training program either in Spanish or English, as required, to further enhance these offerings.

Services and Rates

The Pilot Project would provide WiFi broadband service throughout the Municipality of Villalba. EdNet anticipates defraying a portion of the cost of the network by charging market-based subscription rates to commercial subscribers and those residential subscribers that fall above the income eligibility threshold established by the Commission. In addition, to encourage tourism and economic development, EdNet would provide a limited amount of free broadband access to visitors.

For income-eligible residents, EdNet would use federal support to offer dramatically lower rates, including a special non-recurring connection charges substantially below those that would be available to customers that do not meet the low-income eligibility requirements. Monthly recurring service charges for eligible low-income residents would be well below those available to other EdNet customers, and a fraction of the rates prevailing in the market.

EdNet would offer all customers the opportunity to obtain broadband-enabled desktop, laptop, or tablet computers with low-cost financing enabling them to pay for these devices over a period of up to two years as part of their monthly service charges. If the Commission determines to provide support for broadband-enabled consumer devices, EdNet would be able to reduce or waive these charges for eligible customers.

EdNet would not impose any separate charge for the digital literacy training services described above, but would provide those in partnership with the municipality of Villalba, as described above.

Benefits and Performance Evaluation

The Pilot Project promises tremendous benefits for the Municipality of Villalba and its residents. Expanded access to broadband would:

- Promote economic development, facilitate small business expansion, and improve the residents' economic prospects.

- Increase the availability and use of broadband services, enabling residents to use municipal services online, reducing the government's operating costs.

- Encourage the improvement of the resident's educational level and their opportunity to obtain better income.

- Provide broadband access services to some anchor institutions that do not currently have them.

EdNet's belief is that, by providing service at an affordable price point and by placing significant emphasis on training, residents of Villalba will adopt broadband usage in a sustainable manner that, over time, would reduce the levels of poverty in the municipality and the resulting need for support.

EdNet has substantial experience evaluating and tracking the results of similar broadband deployment projects it has executed in other parts of Puerto Rico, notably in Mayagüez and San Lorenzo, as described above. In EdNet's view, the Commission should keep the process as straightforward as possible. A few key data metrics, coupled with analysis of the underlying factors that drove results (positive or negative) should be sufficient to provide the Commission with a wealth of information about what works and what does not.

Typically, EdNet has complied data documenting its results over time. In some cases, where deployment was focused on publically-accessible broadband devices in local libraries, such data would include the number of people who enrolled in EdNet's training courses and, at intervals following completion of the training, the extent of their continuing use of broadband Internet access services. For the Pilot Project, EdNet would anticipate expanding its data collection efforts to include, for example, (1) a baseline survey to assess public access to broadband, as well as prevailing levels of awareness and understanding of its use and benefits; (2) enrollment in the various training options EdNet would offer; (3) changes in subscription rates, particularly among low-income users; and (4) sustainability of results over the two-year duration of the Pilot Project.

Such metrics correspond closely to the data that the National Telecommunications and Information Administration ("NTIA") is gathering from recipients of Sustainable Broadband Adoption ("SBA") grants under the Broadband Technology Opportunities Program, which EdNet believes could be readily adapted for use by the Commission in connection with its low-income broadband pilot program. Each calendar quarter, SBA grant award recipients submit Performance Progress Reports to NTIA that identify any significant project accomplishments or challenges, as well as a few key data metrics, specifically (1) the size of the target audience; (2) the actual number of program participants; and (3) the number of new subscriber households and

businesses.[17] In addition, SBA grant award recipients file Annual Performance Progress Reports providing additional information, including the amount and type of equipment provided, participation in various types of training, estimated changes in broadband adoption levels in the communities they serve, the most significant barriers to broadband adoption, and suggested best practices and lessons learned.[18]

In addition to informing the Commission's future decisions on universal service funding for broadband access among low-income individuals, such evaluations would also provide data to determine whether any adjustments to the Pilot Project parameters could increase the benefits to the public during the project period, subject to Commission approval, such as:

- Adjustment to the amount of bandwidth offered;

- Increase (or decrease) of the nonrecurring or monthly charges; or

- Changes to the subscriber's qualification criteria.

In this way, it would be possible for EdNet and the Commission to gauge the effects of such fine-tuning within a single project and target population during the period of execution of the Pilot Project.

Other Issues Raised in the *Further Inquiry*

In addition to the above description of its proposed Pilot Program, EdNet offers the following additional discussion of the issues raised in the *Further Inquiry* based on a review of the comments and reply comments placed in the record.

First, EdNet believes that the Commission has ample legal authority to provide support for consumer equipment and training to be offered as part of a low-income broadband pilot program. As is reflected in EdNet's reply comments in this proceeding, the Commission has broad statutory authority to pursue its universal service goals under the mandates contained in Section 1 of the Communications Act of 1934, as amended, 47 U.S.C. § 151, and Section 706 of the Telecommunications Act of 1996, 47 U.S.C. § 1302(b). Section 1 gives the Commission broad authority to "to make available, so far as possible, to all the people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex, a rapid, efficient, Nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable

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[17] *See* NTIA Broadband Technology Opportunities Program, Sustainable Broadband Adoption Quarterly Performance Progress Report (attached hereto as Attachment A), available at: http://www2.ntia.doc.gov/files/sbaquarterlyfinal.pdf).

[18] *See* NTIA Broadband Technology Opportunities Program, Sustainable Broadband Adoption Annual Performance Progress Report (attached hereto as Attachment B), available at: http://www2.ntia.doc.gov/files/sbaannualfinal.pdf).

charges."[19] By referring broadly to "communications service," this directive encompasses a broad range of services that clearly sweeps more broadly than the more limited category of telecommunications services regulated under Title II. Further, the explicit reference to "adequate facilities" gives the Commission authority to ensure that consumers have access to the equipment they need in order to make effective use of the services available.

Further, Section 706(a) of the Telecommunications Act of 1996, 47 U.S.C. § 1302(a), provides a further basis for the Commission's authority to provide support for equipment and training in this context. Section 706(a) requires the Commission to "encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans . . . by utilizing, in a manner consistent with the public interest, convenience, and necessity, price cap regulation, regulatory forbearance, measures that promote competition in the local telecommunications market, or other regulating methods that remove barriers to infrastructure investment," 47 U.S.C. § 151.[20] As the Commission recently found, this section "necessarily invested the Commission with the statutory authority to carry out those acts."[21] Further, as EdNet explained in its initial Comments in this proceeding, should the Commission determine to conduct a Section 10 forbearance analysis, the statutory criteria would be readily met.[22]

Section 706(b) provides a further statutory basis for low-income broadband support. Section 706(b) requires the Commission annually to "determine whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion."[23] In its most recent report, the Commission reiterated its negative finding on that question, obligating it to "take immediate action to accelerate deployment of such capability by removing barriers to infrastructure investment and by promoting competition in the telecommunications market."[24] Support for broadband

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[19] 47 U.S.C. § 151.

[20] Indeed, from a legal standpoint, the Commission's authority to provide support for broadband equipment is likely coextensive with its authority to provide support for broadband services. While the Commission's policy framework today draws a sharp distinction between equipment and services, the Communications Act itself contains no such legal mandate. For decades, as the Commission pursued its universal service goals under the mandate contained in Section 1, it did so under a regime where CPE was offered pursuant to monthly recurring charges contained in common carrier tariffs. Universal service support at the time, while largely implicit in rate structures, drew no distinction between the cost of service and the cost of equipment.

[21] *Preserving the Open Internet*, GN Docket No. 09-101, Report and Order, FCC 10-201, 25 FCC Rcd 17905 (2010), at ¶ 120.

[22] *See* Comments of EdNet (filed Apr. 21, 2011), at 8-10.

[23] 47 U.S.C. § 1302(b).

[24] *Id.*; *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such*

equipment and training for low-income consumers would directly address several of the barriers to adoption that the Commission identified in its *Seventh Section 706 Report*, including the affordability of broadband service,[25] affordability of computers and other equipment necessary to access broadband service;[26] and a lack of digital literacy and understanding of broadband's relevance.[27]

In addition, EdNet supports the arguments made by Gila River Telecommunications (Gila River) and Cox Communications that Section 254 of the Communications Act offers the Commission jurisdiction to provide funding for broadband equipment and training. As Gila River observes, the universal service principles in Section 254(b)(2) and (b)(3) establish a clear mandate for the Commission to promote access to advanced services,[28] particularly in insular areas such as Puerto Rico. As Cox Communications argues, the definition of universal service that the Commission establishes under Section 254(c) is an "evolving" one that must "tak[e] into account advances in telecommunications and information technologies and services," 47 U.S.C. § 254(c), and that, therefore, the Commission has authority to include broadband services and equipment.[29]

Second, EdNet offers the following discussion of the question in the *Further Inquiry* regarding whether to adopt the NARUC recommendation that participants in the broadband pilot program not be required to change local telephone service providers, purchase bundled broadband and voice services, or otherwise be "penalized" when they purchase Lifeline and Link Up broadband services and enabling access devices. EdNet believes that, regardless of how the Commission decides these questions, it should make clear that low-income support received through the broadband pilot program is not subject to the Commission's new "one discount per eligible consumer" rules.[30] In many cases, a low-income consumer may be receiving a Lifeline-supported service from a telecommunications carrier that differs from the broadband pilot participant. The consumer should not be forced to choose whether to receive low-income support for his or her voice service or broadband.

Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act, GN Docket No. 10-159, Seventh Broadband Progress Report And Order On Reconsideration, FCC 11-78 (rel. May 20, 2011) ("*Seventh Section 706 Report*"), at ¶ 64.

[25] *See Seventh Section 706 Report,* at ¶ 70.

[26] *Id.* at ¶ 72.

[27] *Id.* at ¶¶ 73-74.

[28] Comments of Gila River (filed Aug. 26, 2011), at 4-5.

[29] Comments of Cox Communications (filed Aug. 26, 2011), at 4-6. Cox further correctly argues that Section 4(i) of the Communications Act provides a further basis for jurisdiction, *id.* at 6-7.

[30] *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-97, Report and Order, FCC 11-97, 26 FCC Rcd 9022 (2011), at ¶ 8.

Further, the Commission should make clear that commercial, for-profit broadband service providers are eligible to participate in the low-income broadband pilot program. Many commercial entities, such as EdNet, are well positioned to offer a comprehensive suite of broadband services, equipment, and training targeted to the needs of low-income consumers. In addition, commercial broadband service providers would be essential participants if the Commission ultimately adopts a national low-income broadband support program. To exclude them from participating in the pilot program would needlessly limit the comprehensiveness of the pilot program's results data.

With respect to the questions relating to bundling, EdNet believes that the WiFi-based broadband service it proposes to offer in the Pilot Project would not preclude a consumer from continuing to receive voice service from another carrier. At the same time, EdNet's broadband offering would be capable of supporting a VoIP service, should the consumer choose that option, although EdNet is not an Eligible Telecommunications Carrier permitted to receive traditional Lifeline support.

Conclusion

EdNet strongly supports the Commission's efforts to expand access to broadband services for low-income individuals. This effort aligns precisely with EdNet's mission in Puerto Rico, and EdNet would welcome the opportunity to lead the Pilot Project, described above, focused on non-native speakers of English in Puerto Rico.

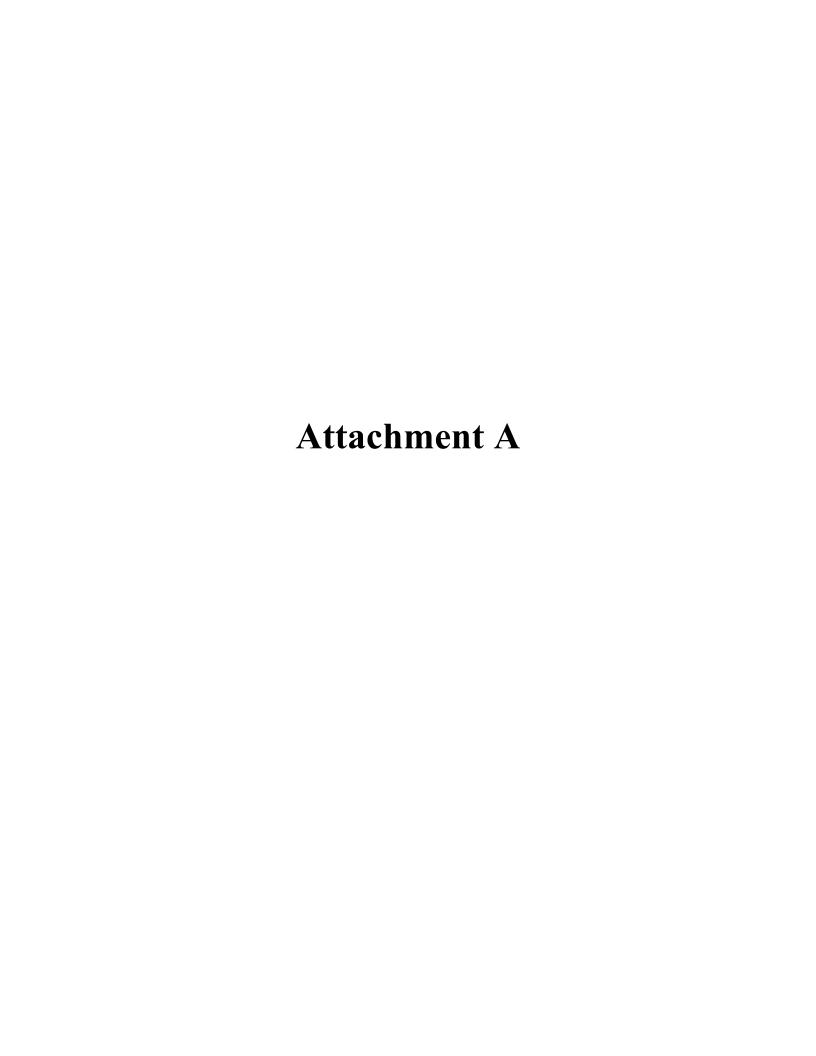Very truly yours,

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September 28, 2011

Attachment A

Sustainable Broadband Adoption Quarterly Performance Progress Report Introduction

SUBMISSION REQUIREMENTS:
All Broadband Technology Opportunities Program (BTOP) grant recipients are required to complete a quarterly performance progress report (PPR). The attached performance progress report form must be completed and submitted after the end of every quarter in the Post-Award Monitoring (PAM) System, and reports must be submitted separately for each BTOP award. The prime recipient is solely responsible for the accurate completion and timely submission of this form.

DEADLINE:
All recipients are required to submit their quarterly performance progress report by 11:59pm ET on the 30th calendar day after the fiscal quarter ends (for example, if the fiscal quarter ends on June 30, performance progress reports are due no later than 11:59pm ET on July 30). The timely submission of performance progress reports is a requirement of all BTOP awards as stated in the special award conditions. Incomplete submissions will be sent back to the recipient for further information.

COMPLETING THE PERFORMANCE PROGRESS REPORT:
To begin preparing the performance progress report, the recipient should log into PAM and create a PPR report package for the relevant reporting period. The recipient should download the report template from PAM. As described in the attached instructions, PAM will pre-populate some of the information in the template with information already stored in PAM.

The BTOP performance progress report form consists of three main sections:
- Section 1: General Information
- Section 2: Report Data Fields
- Section 3: Budget Data Fields

Each question must be answered fully and accurately (within the specified word limits). If your answer to certain questions does not fit in the space provided, please provide additional information in a separate document or spreadsheet, using the format provided in the performance progress report form. If a particular question does not apply to your project, please write "N/A" or "0" in the response field. All fields should be filled out either with the requested data or "N/A." Please note that even if the only access to the information is through a subrecipient, contractor, and/or subcontractor, the prime recipient is responsible for collecting this information and submitting it to NTIA.

Please reference the attached line item instructions and the PAM User Guide for assistance. If you have additional questions, please contact your assigned Federal Program Officer.

DATA REVIEW:
Program Office staff will be responsible for reviewing performance progress reports and may need to follow up with recipients regarding the submitted data. Recipients must promptly respond to any and all Program Office follow-up questions regarding the submitted data; in some cases, recipients will be required to revise and re-submit performance progress reports. The data provided will be compared to each recipient's Baseline Project Plan and will help the Program Office monitor the progress and performance of each BTOP project.

Once approved by the Program Office, all performance progress reports will be made publicly available via the Internet. To the extent that recipients believe that the information they are providing is confidential, recipients may make a request for such information to be kept private and identify any information they believe should not be released to the public. They should also provide both a redacted and an unredacted version of their report. Recipients should note, however, that the Recovery Act requires substantial transparency and that NTIA may not necessarily approve such requests. If NTIA does approve, the agency will keep such information private from public disclosure to the extent permitted

by law, including the Freedom of Information Act, as amended (5 U.S.C. 552), the Trade Secrets Act, as amended (18 U.S.C. 1905), and the Economic Espionage Act of 1996 (18 U.S.C. 1831 et seq.).

Quarterly Performance Progress Report Questions for Sustainable Broadband Adoption

General Information					
		Page	of	Pages	
1. Federal Agency and Organization Element to Which Report is Submitted	2. Award Identification Number	3. DUNS Number			
4. Recipient Organization (Name and complete address including county, congressional district, and zip code)					
5. Current Reporting Period End Date *(MM/DD/YYYY)*		6. Is this the Last Report of the Award Period?		□ Yes □ No	
7. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.					
7a. Typed or Printed Name and Title of Certifying Official		7c. Telephone *(area code, number and extension)*			
		7d. Email Address			
7b. Signature of Certifying Official		7e. Date Report Submitted *(MM/DD/YYYY)*			

Project Indicators (This Quarter)

1. Please describe significant project accomplishments completed during this quarter (600 words or less).

2. Please provide the percent complete for the following key milestones in your project. Write "0" in the Percent Complete column and "N/A" in the Narrative column if your project does not include this activity. If you provided additional milestones in your baseline report, please insert them at the bottom of the table. Figures should be reported cumulatively from award inception to the end of the most recent reporting quarter. Please provide a narrative description if the percent complete is different from the target provided in your baseline plan (300 words or less).

	Milestone	Percent Complete	Narrative (describe your reasons for any variance from the baseline plan or any other relevant information)
2.a.	Overall Project		
2.b.	Equipment/Supply Purchases		
2.c.	Awareness Campaigns		
2.d.	Outreach Activities		
2.e.	Training Programs		
2.f.	Other (please specify):		

3. Please describe any challenges or issues faced during this past quarter in achieving planned progress against the project milestones listed above. In particular, please identify any areas or issues where technical assistance from the BTOP program may be useful (600 words or less).

4a. In the chart below, please provide the requested information on your BTOP grant-funded SBA activities. Please also provide a short description of the activity (600 words or less). Figures should be reported cumulatively from award inception to the end of the most recent reporting quarter. Please ensure that the numbers of new household subscribers and business or community anchor institution (CAI) subscribers reflected in the "Total" row represent the unduplicated number of new subscribers that can be attributed to your SBA project as a whole.

Name of the SBA Activity	Location of SBA Activity	Description of Activity (600 words or less)	Size of Target Audience	Actual Number of Participants	New Subscribers Households	New Subscribers: Businesses and/or CAIs
		Total				

4b. Please describe your method for determining the number of households, businesses, and/or (CAIs) subscribing to broadband as a result of your SBA programs (600 words or less).

4c. Please provide a narrative explanation if the total number of new subscribers is different from the targets provided in your baseline plan (600 words or less).

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4d: Please provide the number of households and the number of businesses and CAIs receiving discounted broadband service as result of BTOP funds.	
Households:	Businesses and CAIs:

Project Indicators (Next Quarter)

1. Please describe significant project accomplishments planned for completion during the next quarter (600 words or less).

2. Please provide the percent complete anticipated for the following key milestones in your project as of the end of the next quarter. Write "0" in the Planned Percent Complete column and "N/A" in the Narrative column if your project does not include this activity. If you provided additional milestones in your baseline report, please insert them at the bottom of the table. Figures should be reported cumulatively from award inception to the end of the next reporting quarter. Please provide a narrative description if the planned percent complete is different from the target provided in your baseline plan (300 words or less).

	Milestone	Planned Percent Complete	Narrative (describe your reasons for any variance from the baseline plan or any other relevant information)
2.a.	Overall Project		
2.b.	Equipment Purchases		
2.c.	Awareness Campaigns		
2.d.	Outreach Activities		
2.e.	Training Programs		
2.f.	Other (please specify):		

3. Please describe any challenges or issues anticipated during the next quarter that may impact planned progress against the project milestones listed above. In particular, please identify any areas or issues where technical assistance from the BTOP program may be useful (600 words or less).

SUSTAINABLE BROADBAND ADOPTION BUDGET EXECUTION DETAILS

Activity Based Expenditures (Sustainable Broadband Adoption)

1. Please provide details below on your total budget, cumulative actual expenditures (for the period ending the current quarter), and cumulative anticipated expenditures (for the period ending next quarter) for each line item, including detailed disbursements of both matching funds and federal funds from project inception through end of this quarter (actual) or next quarter (anticipated). Actual and anticipated figures should be reported cumulatively from award inception to the end of the applicable reporting quarter.

COST CLASSIFICATION	Budget for Entire Project			Actuals from Project Inception through End of Current Reporting Period			Anticipated Actuals from Project Inception through End of Next Reporting Period		
	Total Cost (plan)	Matching Funds (plan)	Federal Funds (plan)	Total Costs	Matching Funds	Federal Funds	Total Costs	Matching Funds	Federal Funds
a. Personnel	$0	$0	$0	$0	$0	$0	$0	$0	$0
b. Fringe Benefits	$0	$0	$0	$0	$0	$0	$0	$0	$0
c. Travel	$0	$0	$0	$0	$0	$0	$0	$0	$0
d. Equipment	$0	$0	$0	$0	$0	$0	$0	$0	$0
e. Supplies	$0	$0	$0	$0	$0	$0	$0	$0	$0
f. Contractual	$0	$0	$0	$0	$0	$0	$0	$0	$0
g. Construction	$0	$0	$0	$0	$0	$0	$0	$0	$0
h. Other	$0	$0	$0	$0	$0	$0	$0	$0	$0
I. Total Direct Charges (sum of a through h)	$0	$0	$0	$0	$0	$0	$0	$0	$0
j. Indirect Charges	$0	$0	$0	$0	$0	$0	$0	$0	$0
TOTALS (sum of i and j)	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**	**$0**

2. Program Income: Please provide the program income you listed in your application budget and actuals to date through the end of the reporting period.

a. Application Budget Program Income:	b. Program Income to Date:

Sustainable Broadband Adoption Quarterly Performance Progress Report Instructions

Line Item Instructions for the Performance Progress Report Attachment
(BTOP Quarterly Report for Sustainable Broadband Adoption Projects)

Question Number	Reporting Item	Instructions	Clarification and Definitions
General Information			
1	Federal Agency and Organizational Element to Which Report is Submitted	PAM will pre-populate this information in the PPR template.	"Department of Commerce, National Telecommunications and Information Administration."
2	Award Identification Number	PAM will pre-populate this information in the PPR template.	This should match your 10 digit grant award number listed on your award package CD-450 form.
3	DUNS Number	PAM will pre-populate this information in the PPR template.	The number entered should match the Data Universal Numbering System (DUNS) number or Central Contract Registry extended DUNS number listed on your award package CD-450 form.
4	Recipient Organization	PAM will pre-populate this information in the PPR template.	The data entered should match the data listed on your award package CD-450 form.
5	Reporting Period End Date	PAM will pre-populate this information in the PPR template.	
6	Is this the last report of the award period?	Check yes or no.	

7a	Certifying Official	PAM will pre-populate this information in the PPR template.	The Certifying Official should be the AOR or the Principal Investigator/Project Manager designated by the AOR.
7b	Certifying Official Signature	PAM will add this information electronically when the report is submitted.	
7c	Telephone Number	PAM will pre-populate this information in the PPR template.	
7d	Email Address	PAM will pre-populate this information in the PPR template.	
7e	Report Submission Date	PAM will add this information electronically when the report is submitted.	Reports are to be submitted by the quarterly due dates.
Project Indicators (This Quarter)			
1	Project Accomplishments	Please describe significant project accomplishments during the quarter.	Include only accomplishments that took place during this reporting period. Accomplishments can be described quantitatively or qualitatively. For example, project accomplishments may include counts, percentages, targeted dates, time periods, or levels. A project accomplishment could also refer to a condition, a result, or a status. Please limit narrative responses to 600 words or less.
2	Percent of Milestones Complete	Please provide the percent complete for the following key milestones in your project. Write "0" in the Percent Complete column and "N/A"	The percentage of completion for each milestone should be based primarily on the expenditure of your project budget (federal

		in the Narrative column if your project does not include this activity. If you provided additional milestones in your baseline plan, please insert them at the bottom of the table. Figures should be reported cumulatively from award inception to the end of the most recent reporting quarter. Please provide a narrative description if the percent complete is different from the target provided in your baseline plan.	and matching funds), and the percentages should be reported cumulatively from award inception through the end of the each quarter. For example, if you complete a particular milestone within the first three quarters of your project, the third quarter and all subsequent quarters should state 100%. "Outreach Activities" include activities and expenditures related to in person meetings or events with potential partner organizations, potential broadband subscribers, and potential program participants. "Awareness Campaigns" include activities and expenditures related to paid and earned media activities, advertisements, and the preparation and dissemination of broadband materials. Please limit narrative responses to 300 words or less.
3	Challenges or Issues	Please describe any challenges or issues faced during this past quarter in achieving planned progress against the project milestones listed above. In particular, please identify any areas or issues where technical assistance from the BTOP program may be useful.	Provide information on any challenges, incidents, barriers or issues that you have encountered. In your narrative, indicate whether the issue remains or has been corrected or mitigated. If corrected or mitigated, indicate how the issue was resolved. Please limit narrative responses to 600 words or less.
4a-d	SBA Activities and New Subscribers	4a. Please provide the requested information on BTOP grant-funded SBA activities. Figures	Location of the SBA Activity: Describe the area (e.g., town/city, state) that your SBA

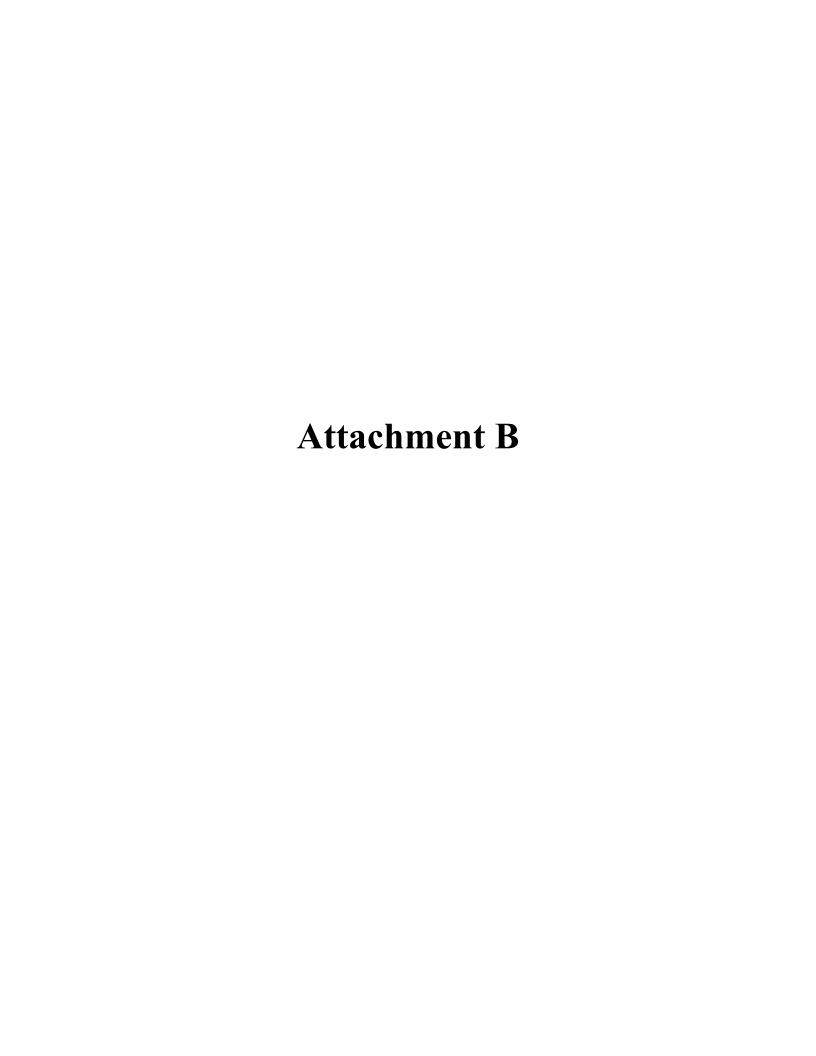| | | should be reported cumulatively from award inception to the end of the most recent reporting quarter. Please ensure that the numbers of new household subscribers and business or community anchor institution (CAI) subscribers reflected in the "Total" row represent the unduplicated number of new subscribers that can be attributed to your SBA project as a whole. | program targets. If more than one location is included, please complete a separate line for each city or region (e.g., Franklin County). |
		4b. Please describe your method for determining the number of households, businesses, and/or CAIs subscribing to broadband as a result of your SBA programs.	Description of Activity: Provide a short description of the SBA program(s).
		4c. Please provide a narrative explanation if the total number of new subscribers is different from the targets provided in your baseline plan.	Size of Target Audience: Provide the number of individuals targeted by your SBA activity (in the geographic area defined).
		4d. Please provide the number of households and the number of businesses and CAIs receiving discounted broadband service as a result of BTOP funds.	Actual Number of Participants: Provide the actual number of participants in each particular SBA activity.
			Number of New Subscribers: Indicate the number of new broadband subscriptions in the identified area since the start of your project.
			A new subscriber is defined as a household, business, or CAI that did not subscribe to broadband prior to the start of your project.
			Methods for calculating the number of subscribers may include use of broadband provider statistics, surveys, interviews, campaign attendance records, or any other measurable data collection method.
			If multiple SBA activities contribute to one new broadband subscriber, please attribute that new subscriber to only one SBA activity.
			Please limit narrative responses to 600 words or less.
Project Indicators			

(Next Quarter)			
1	Planned Project Accomplishments	Please describe significant project accomplishments planned for completion during the next quarter.	Include only anticipated accomplishments that will take place during the next reporting period. Accomplishments can be described quantitatively or qualitatively. For example, project accomplishments may include counts, percentages, targeted dates, time periods, or levels. A project accomplishment could also refer to a condition, a result, or a status. Please limit narrative responses to 600 words or less.
2	Anticipated Milestone Completion	Please provide the percent complete anticipated for the following key milestones in your project as of the end of the next quarter. Write "0" in the Percent Complete column and "N/A" in the Narrative column if your project does not include this activity. If you provided additional milestones in your baseline report, please insert them at the bottom of the table. Figures should be reported cumulatively from award inception to the end of the next reporting quarter. Please provide a narrative description if the planned percent complete is different from the target provided in your baseline plan.	The percentage of completion for each milestone should be based primarily on the expenditure of your project budget (federal and matching funds), and the percentages should be reported cumulatively from award inception through the end of the each quarter. For example, if you expect to complete a particular milestone within the first three quarters of your project, the third quarter and all subsequent quarters should state 100%. Please limit narrative responses to 300 words or less.
3	Anticipated Challenges or Issues	Please describe any challenges or issues anticipated during the next quarter that may impact planned progress against the project milestones listed above. In particular, please identify any areas or issues where technical assistance from the BTOP program may be useful.	Provide information on any challenges, incidents, barriers or issues that you have encountered. In your narrative, indicate whether the issue remains or has been corrected or mitigated. If corrected or mitigated, indicate how the issue was resolved.

			Please limit narrative responses to 600 words or less.
Activity-Based Expenditure and Revenues (Sustainable Broadband Adoption)			
1a-1j	Actual Budget Costs and Anticipated Budget Costs	Please provide details below on your total budget, cumulative actual expenditures (for the period ending the current quarter), and cumulative anticipated expenditures (for the period ending next quarter) for each line item, including detailed disbursements of both matching funds and federal funds from project inception through end of this quarter (actual) or next quarter (anticipated). Actual and anticipated figures should be reported cumulatively from award inception to the end of the applicable reporting quarter.	The budget line item definitions remain consistent with those in the original grant application.
2a-2b	Program Income	Please provide the program income you listed in your application budget and actuals to date through the end of the reporting period.	Program income is gross income earned by the recipient from Federally supported activities. Recipients are required to account for program income related to projects financed in whole or in part with Federal funds. Program income excludes interest earned on advances and includes, but is not limited to, income from service fees, conference fees, sale of commodities, usage or rental fees, and royalties on patents and copyrights. Proceeds from the sale of real and personal property purchased in whole or in part with Federal funds is not program income and shall be handled in accordance with the property management provisions set forth in the award.

			Recipients have no obligation to the Federal Government with respect to program income earned from license fees and royalties for copyrighted material, patents, patent applications trademarks, and inventions produced under the award.

Notwithstanding any other provision of law, no person is required to respond to, nor shall any person be subject to a penalty for failure to comply with, a collection of information subject to the Paperwork Reduction Act unless that collection of information displays a currently valid OMB control number. Public reporting burden for this collection of information is estimated to average 3.97 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Anthony G. Wilhelm, Director, Broadband Technology Opportunities Program, Office of Telecommunications and Information Applications, National Telecommunications and Information Administration, U.S. Department of Commerce (DOC), 1401 Constitution Avenue, N.W., HCHB, Room 4887, Washington, D.C. 20230

Attachment B

Sustainable Broadband Adoption Annual Performance Progress Report Introduction

SUBMISSION REQUIREMENTS:

All Broadband Technology Opportunities Program (BTOP) grant recipients are required to complete an annual performance progress report. The attached performance progress report form must be completed and submitted after the end of every calendar year in the Post-Award Monitoring (PAM) System, and reports must be submitted separately for each BTOP award. The prime recipient is solely responsible for the accurate completion and timely submission of this form.

DEADLINE:

All recipients are required to submit their annual performance progress report each year on January 30th, by 11:59pm ET. The timely submission of performance progress reports is a requirement of all BTOP awards as stated in the special award conditions. Incomplete submissions will be sent back to the recipient for further information. Annual reports are to be submitted in addition to the required quarterly report which is due concurrently. The reports are different in scope and must be answered separately.

COMPLETING THE PERFORMANCE PROGRESS REPORT:

To begin preparing the performance progress report, the recipient should log into PAM and create a PPR report package for the relevant reporting period. The recipient should download the report template from PAM. As described in the attached instructions, PAM will pre-populate some of the information in the template with information already stored in PAM.

The BTOP performance progress report form consists of two main sections:
- Section 1: General Information
- Section 2: Report Data Fields

Each question must be answered fully and accurately (within the specified word limits). If your answer to certain questions does not fit in the space provided, please provide additional information in a separate document or spreadsheet, using the format provided in the performance progress report form. If a particular question does not apply to your project, please write "N/A" or "0" in the response field. All fields should be filled out either with the requested data or "N/A." Please note that even if the only access to the information is through a subrecipient, contractor, and/or subcontractor, the prime recipient is responsible for collecting this information and submitting it to NTIA.

Please reference the attached line item instructions and the PAM User Guide for assistance. If you have additional questions, please contact your assigned Federal Program Officer.

DATA REVIEW:

Program Office staff will be responsible for reviewing performance progress reports and may need to follow up with recipients regarding the submitted data. Recipients must promptly respond to any and all Program Office follow-up questions regarding the submitted data; in some cases, recipients will be required to revise and re-submit performance progress reports. The data provided will be compared to each recipient's Baseline Project Plan and will help the Program Office monitor the progress and performance of each BTOP project.

Once approved by the Program Office, all performance progress reports will be made publicly available via the Internet. To the extent that recipients believe that the information they are providing is confidential, recipients may make a request for such information to be kept private and identify any information they believe should not be released to the public. They should also provide both a redacted and an unredacted version of their report. Recipients should note, however, that the Recovery Act requires substantial transparency and that NTIA may not necessarily approve such requests. If NTIA does approve, the agency will keep such information private from public disclosure to the extent permitted by law, including the

Freedom of Information Act, as amended (5 U.S.C. 552), the Trade Secrets Act, as amended (18 U.S.C. 1905), and the Economic Espionage Act of 1996 (18 U.S.C. 1831 et seq.).

Annual Performance Progress Report Questions for Sustainable Broadband Adoption

General Information					
		Page	of		Pages
1. Federal Agency and Organization Element to Which Report is Submitted	2. Award Identification Number	3. DUNS Number			
4. Recipient Organization (Name and complete address including county, congressional district, and zip code)					
5. Current Reporting Period End Date *(MM/DD/YYYY)*		6. Is this the Last Annual Report of the Award Period?		□ Yes □ No	
7. Certification: I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.					
7a. Typed or Printed Name and Title of Certifying Official		7c. Telephone *(area code, number and extension)*			
		7d. Email Address			
7b. Signature of Certifying Official		7e. Date Report Submitted *(MM/DD/YYYY)*			

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Project Indicators

1. Does your Sustainable Broadband Adoption (SBA) project foster a particular broadband technology or technologies? If so, please describe this technology (or technologies) (600 words or less).

2a. Please list all of the broadband equipment and/or supplies you have purchased during the most recent calendar year using BTOP grant funds or other (matching) funds, including any customer premises equipment or end-user devices. If additional space is needed, please attach a list of equipment and/or supplies. Please also describe how the equipment and supplies have been deployed (100 words or less).

Manufacturer	Item	Unit Cost per Item	Number of Units	Narrative description of how the equipment and supplies were deployed
Totals				

2b. To the extent you distribute equipment/supplies to beneficiaries of your project, please describe the equipment/supplies you distribute, the quantities distributed, and the specific populations to whom the equipment/supplies are distributed (600 words or less).

3. For SBA access and training provided with BTOP grant funds, please provide the information below. Unless otherwise indicated in the instructions, figures should be reported cumulatively from award inception to the end of the most recent calendar year. For each type of training (other than open access), please count only the participants who completed the course.

Types of Access or Training	Number of People Targeted	Number of People Participating	Total Training Hours Offered
Open Lab Access			0
Multimedia			
Office Skills			
ESL			
GED			
College Preparatory Training			
Basic Internet and Computer Use			
Certified Training Programs			
Other (please specify):			
Total			

4. Please describe key economic and social successes of your project during the past year, and why you believe the project is successful thus far (600 words or less).

5. Please estimate the level of broadband adoption in the community(ies) and/or area(s) your project serves, explain your methodology for estimating the level of broadband adoption, and explain changes in the broadband adoption level, if any, since the project began.

5a. Adoption Level (%):	Narrative description of level, methodology, and change from the level at project inception (600 words or less).

6. Please describe the two most common barriers to broadband adoption that you have experienced this year in connection with your project. What steps did you take to address them (600 words or less)?

7. To the extent that you have made any subcontracts or subgrants, please provide the number of subcontracts or subgrants that have been made to socially and economically disadvantaged small business (SDB) concerns as defined by section 8(a) of the Small Business Act, 15 U.S.C. 647, as modified by NTIA's adoption of an alternative small business size standard for use in BTOP. Please also provide the names of these SDB entities (150 words or less).

8. Please describe any best practices/lessons learned that can be shared with other similar BTOP projects (900 words or less).

Sustainable Broadband Adoption Annual Performance Progress Report Instructions

Line Item Instructions for the Performance Progress Report Attachment
(BTOP Annual Report for Sustainable Broadband Adoption Projects)

Question Number	Reporting Item	Instructions	Clarification and Definitions
General Information			
1	Federal Agency and Organizational Element to Which Report is Submitted	PAM will pre-populate this information in the PPR template.	"Department of Commerce, National Telecommunications and Information Administration."
2	Award Identification Number	PAM will pre-populate this information in the PPR template.	This should match your 10 digit grant award number listed on your award package CD-450 form.
3	DUNS Number	PAM will pre-populate this information in the PPR template.	The number entered should match the Data Universal Numbering System (DUNS) number or Central Contract Registry extended DUNS number listed on your award package CD-450 form.
4	Recipient Organization	PAM will pre-populate this information in the PPR template.	The data entered should match the data listed on your award package CD-450 form.
5	Reporting Period End Date	PAM will pre-populate this information in the PPR template.	
6	Is this the last annual report of the award period?	Check yes or no.	
7a	Certifying Official	PAM will pre-populate this information in the	The Certifying Official should be the AOR or

		PPR template.	the Principal Investigator/Project Manager designated by the AOR.
7b	Certifying Official Signature	PAM will add this information electronically when the report is submitted.	
7c	Telephone Number	PAM will pre-populate this information in the PPR template.	
7d	Email Address	PAM will pre-populate this information in the PPR template.	
7e	Report Submission Date	PAM will add this information electronically when the report is submitted.	Reports are to be submitted by the annual due dates.
Project Indicators			
1	Broadband Technology	Does your Sustainable Broadband Adoption (SBA) project foster a particular broadband technology or technologies? If so, please describe this technology (or technologies).	If your SBA project does not foster a particular broadband technology, please write "N/A." Please limit narrative responses to 600 words or less.
2a	SBA Equipment	Please list all of the broadband equipment and/or supplies you have purchased during the most recent calendar year using BTOP grant funds or other (matching) funds, including any customer premises equipment or end-user devices. If additional space is needed, please attach a list of equipment and/or supplies. Please also describe how the equipment and supplies have been deployed.	Equipment is defined as tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of $5,000 or more per unit. Supplies are defined as all tangible personal property other than "equipment". Please limit narrative responses (i.e., descriptions of use) to 100 words or less.
2b	SBA Equipment	To the extent you distribute equipment/supplies to consumers, please describe the equipment/supplies you distribute, the quantities distributed, and the specific populations to whom the	Please limit narrative responses to 600 words or less.

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		equipment/supplies are distributed.	
3	SBA Access and Training	For SBA access and training provided with BTOP grant funds, please provide the information below. For each type of training (other than open access), please count only the participants who <u>completed</u> the course.	Recipients are not required to report upon hours of training provided during open access. This field has been pre-populated with a 0. For each type of training (other than open access), "Number of People Participating" is the number of individuals attending and completing a scheduled, teacher-led training program offered through the SBA project. Do not count participants who attended but did not complete the training. Participants may be counted more than once if they attended multiple types of training. You may specify additional types of training or access as needed. To calculate "Total Hours of Training Offered," multiply the hours per program by the number of participants. For example, if 10 people took a one hour class, that program provided 10 training hours. Please enter a "0" in each column if your project has not provided a particular type of training.
4	Economic and Social Successes	Please describe key economic and social successes of your project during the past year, and why you believe the project is successful thus far.	You may reference other data provided in this report (key indicators) or provide additional information that is not included in your typical quarterly and annual reports. This may include statistics or objective data, but it may also include examples of individual successes experienced by your organization or the individuals benefiting from your program. Please limit narrative responses to 600 words or less.

5	Adoption Level	Please estimate the level of broadband adoption in the community(ies) and/or area(s) your project serves, explain your methodology for estimating the level of broadband adoption, and explain changes in the broadband adoption rate, if any, since the project began.	Methods for calculating the adoption level may include use of broadband provider statistics, surveys, or any other measurable data collection method. You should explain why your estimate and methodology are reasonable. You should also describe how the adoption level compares to the baseline adoption level that existed when your project was initiated. Please limit narrative responses to 600 words or less.
6	Barriers to Adoption	Please describe the two most common barriers to broadband adoption that you have experienced this year in connection with your project. What steps did you take to address them?	Provide two specific examples. For each, please explain either 1) how you have overcome the barrier or 2) how you are currently trying to overcome the barrier. Responses should be limited to 600 words or less.
7	Small Business Concern	To the extent that you have made any subcontracts or subgrants, please provide the number of subcontracts or subgrants that have been made to socially and economically disadvantaged small business (SDB) concerns as defined by section 8(a) of the Small Business Act, 15 U.S.C. 647, as modified by NTIA's adoption of an alternative small business size standard for use in BTOP. Please also provide the names of these SDB entities.	BTOP defines a "socially and economically disadvantaged small business concern as "a firm, together with its controlling interests and affiliates, with average gross revenue not exceeding $40 million for the preceding three years, and that meets the definition of a socially and economically disadvantaged small business concern under the Small Business Act." Please limit responses to 150 words or less.
8	Best Practices	Please describe any best practices/lessons learned that can be shared with other similar BTOP projects, if any.	Responses should be limited to 900 words or less.